

**From:** [Schaub, Mike](#)  
**To:** [Jamie Phillippe](#)  
**Subject:** RE: 2016 TR 304(a) Recommendations and TR website verbiage  
**Date:** Wednesday, September 18, 2019 4:43:00 PM

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Thanks for the update. I've now run through everything in the draft rule again and only have one minor correction to suggest:

In 1115.A.3, end of second sentence, I think the phrase 'has been shown' can be removed.

Otherwise, I have no additional comments in addition to those already provided.

The proposed TR webpage looks good, as does the list of 304a criteria explanations. Much appreciate your work on providing that! You won't need to provide such explanations for the same pollutants again in future TRs unless you wish to (or in case you get data on some that may necessitate adding new criteria). Obviously, in the next cycle, you could always just update that table with any new 304(a) criteria that crop up since initiation of the last triennial, or provide a separate list entirely (for things like aluminum and cyanotoxins, and anything else EPA comes out with in the near future).

So, if I understand what you said below correctly, you will publish the 304a document and any unfinished rule changes (HHC updates?) at the time you publish WQ097 for public comment to 'round out the process'?

As for the chloride ALC work, I asked Diane about it and she indicated that TCEQ had a similar question, neither of which we know the answer to. We plan to put this on the agenda for the October EPA WQS coordinators call to get an update from the criteria folks at HQs.

**Mike Schaub**  
**Water Quality Standards Program**  
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**214-665-7314**

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**From:** Jamie Phillippe <Jamie.Phillippe@LA.GOV>  
**Sent:** Wednesday, September 18, 2019 12:57 PM  
**To:** Schaub, Mike <Schaub.Mike@epa.gov>  
**Subject:** RE: 2016 TR 304(a) Recommendations and TR website verbiage

[Mike,](#)

The attached version of proposed rule WQ097 is the cleanest version. In addition to the differences highlighted below, I found three more differences between the proposed rule and the one you reviewed that I missed:

1. Regarding WQS Variance language in LAC 33:IX.1109.E.1.c (page 13 of 90): The last sentence

mentioning 401 WQC's was meant to be removed. It is the intention to keep WQS variance only with 402/LPDES permits. LDEQ Legal considers 401 WQC's non-permit actions, and WQS variances not applicable to them.

2. Regarding Chlordane in Table 1 (page 24 of 90): The brackish ALC criterion was missing a leading zero before the decimal point.
3. Regarding LAC 33:IX.1115.A.1 (page 35 of 90): The second sentence refers to language that was struck out. I've corrected it.

Please let me know if you have any questions.

Thanks,  
Jamie

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**From:** Schaub, Mike <[Schaub.Mike@epa.gov](mailto:Schaub.Mike@epa.gov)>  
**Sent:** Tuesday, September 17, 2019 11:24 AM  
**To:** Jamie Phillippe <[Jamie.Phillippe@LA.GOV](mailto:Jamie.Phillippe@LA.GOV)>  
**Subject:** RE: 2016 TR 304(a) Recommendations and TR website verbiage

Thanks Jamie. Let me take a look at everything and I'll get back to you with any questions.

**Mike Schaub**  
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**From:** Jamie Phillippe <[Jamie.Phillippe@LA.GOV](mailto:Jamie.Phillippe@LA.GOV)>  
**Sent:** Tuesday, September 17, 2019 9:16 AM  
**To:** Schaub, Mike <[Schaub.Mike@epa.gov](mailto:Schaub.Mike@epa.gov)>  
**Subject:** 2016 TR 304(a) Recommendations and TR website verbiage

Mike,

I've attached files related to the 2016 TR. First is draft language for updating LDEQ's TR webpage. I'm waiting to hear from our regulation development section to determine whether anything else needs to be added to the webpage. I also need to coordinate (probably with AI) on getting the TR webpage updated.

Next is the 304(a) Recommendations document, describing all substances reviewed for the 2016 TR and the agency's actions. This document will have a link on the TR webpage prior to rulemaking/public comment.

Last is the final version of proposed rule WQ097. The only differences between this version and the one you commented on are found in Tables 1 and 1A. The biggest difference is no change to HHC values. I'm keeping the CAS#'s in Table 1 and added missing CAS#'s in Table 1A. Also in Table 1, I

added missing commas for two four digit criteria for consistency (bromoform brackish ALC (1,790) and tetrachloroethylene brackish ALC (1,020)).

After work on the BLM/Selenium QAPP and USGS Minerals project reaches a resting point, I'll draft up a Louisiana TR Process/Timeline guidance document. On the phone, I considered having the Report of Findings and 304(a) Recommendation documents being one and issued at the end of the TR cycle. Now, I believe these documents should be separate, with the 304(a) document and any remaining rules not completed during the TR cycle rounding out the process.

Please let me know if you have any questions on these documents.

Later this week, I may have something to pass by you and Russell concerning the USGS Mineral projects. As I understand it, chloride ALC is being looked at for revision and I'd like to know if there are any significant changes to the methodology; specifically, consideration of sodium and/or potassium cations.

Thanks,  
Jamie